



***National
Environmental
Achievement Track***

Application Form

Waste Isolation Pilot Plant

Name of facility

Name of parent company (if any)

30 Miles S.E. of Carlsbad on Jal Highway

Street address

Street address (continued)

Carlsbad, NM 88220

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Steve Kouba

Title Manager Environmental Compliance

Phone 505-234-8332

Fax 505-234-8854

E-mail koubas@wipp.carlsbad.nm.us

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

WIPP is a cornerstone of DOE's national strategy for the clean-up of defense-related nuclear and hazardous wastes. It is a unique state-of-the art facility that provides safe, permanent disposal of transuranic waste in deep subterranean salt beds beneath the desert of southeastern New Mexico. We are, and intend to remain, the world leader in nuclear waste disposal.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
4953

NAICS
561 562

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☒ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

NM4890139088

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

See attachment 1 Environmental Requirements Checklist

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

We are pursuing the highest standards for environmental excellence. In 1994, WIPP was awarded the "Star Status" in the DOE's Voluntary Protection Program; in 1997 we earned registration for our Environmental Management System under the provision of the International Organization for Standards 14001; and in 1998 certification of our Integrated Safety Management System, and in 1999 and 2000 the Green Zia Environmental Excellence Achievement Award. (See attachment 2 Landmark Events for Our Company) Also in 1999 a WIPP employee was recognized as a energy champion by DOE for his work in Energy Efficiency here at WIPP.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|-----------------------------------|---|
| a. Environmental policy | <input checked="" type="checkbox"/> Yes |
| b. Planning | <input checked="" type="checkbox"/> Yes |
| c. Implementation and operation | <input checked="" type="checkbox"/> Yes |
| d. Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| e. Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

GAP Analysis Annual QA
Audit of the EMS.

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
<i>SK</i> Reduction of hazardous solid waste, brine water containing lead	80.59	<i>SK</i> metric tons	26	metric tons
<p>i. How is the current level an improvement over the previous level?</p> <p><i>SK</i> Actions (such as mine ventilation and maintenance scheduling) were taken to reduce the amount of hazardous waste (brine containing lead). Thereby also reducing the following: waste stream, disposal costs, and hazardous waste management activities.</p> <p>ii. How did you achieve this improvement?</p> <p>We have been able to adjust some operational factors such as exhaust fan speed and maintenance schedules to significantly reduce the amount of condensation and brine production.</p>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
SL Reduction of total solid waste	821.13	SL metric tons	750.67	metric tons
<p>i. How is the current level an improvement over the previous level?</p> <p>We reduced the waste stream and disposal costs. As part of this process we increased the amount of items that can be recycled, and began purchasing products that can be reused several times before disposal.</p>				
<p>ii. How did you achieve this improvement?</p> <p>We continually strive to reduce the volume of municipal solid sanitary waste produced. In 1998, Pollution Prevention Opportunity Assessment (PPOA) 98-001 was initiated to identify ways to reduce the amount of solid waste at the WIPP site. This PPOA recommended the purchase of a sanitary trash compactor to compact sanitary waste at the WIPP. The compactor reduced the volume of sanitary waste going to landfill by 4:1, and also reduced WIPP's waste management costs.</p>				

2. Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? ~~SL~~ Hazardous solid waste reduction
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|--------------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 4.33 metric tons
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 2.1 metric tons
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Through the PPOA process we will be identifying product substitutions that are less hazardous and eliminating duplicate products. This process include evaluating job processes to eliminate the use of hazardous chemicals.

Second aspect you've selected

a. What is the aspect?

☒ Total solid waste reduction

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 750.67 metric tons
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 612 metric tons **SL**
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

WIPP is planning awareness campaigns and training for the construction contractors and WIPP personnel who work in this area. We will evaluate the following processes: disposal practice requirements in the scope of work for subcontractors; closed loop systems for carpet; uses for scrap lumber, wire spools, and pallets.

Third aspect you've selected

- a. What is the aspect? Recycled/Re-used material use **SK**
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 2.73 metric tons (Quantity/Units) **SK**
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 3.0 metric tons (Quantity/Units) **SK**
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? Identify closed loop systems for construction debris, identify new wastes that can be recycled, and increase the amounts of items that are already being recycled.

Fourth aspect you've selected

- a. What is the aspect? Total energy use (BTU/ft.sq.)
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 240,000 BTU/ft.sq (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 181,000 BTU/ft.sq (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Technology based improvements in industrial process equipment, lighting, and Heating, Ventilation, and Air-Conditioning (HVAC) are being implemented to meet site reduction goals. Equipment is purchased in the upper 25% efficiency when available to ensure progress is made. Scheduling of equipment/building operation is reviewed to minimize runtime. Efficiency gains have been offset from increased waste receipt, keeping the overall energy use reporting outside of the reduction goals. Re-baselining efforts are being initiated from installation of additional meters to allow the true energy reduction progress to be reflected.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

Section D

Tell us about your public outreach and reporting.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Our stakeholders include employees, communities surrounding WIPP, and the general public. Most stakeholders are concerned about the safety of transporting nuclear waste to the disposal location. The goals of our outreach efforts are to educate our stakeholders about our environmentally safe project through: Public outreach program; Public meetings on NEPA and RCRA changes; Implementation of a 1-800 information number; Senior management meetings with community leaders.

2 How do you inform community members of important matters that affect them?

We have several methods of communication with our stakeholders that include: Periodic face-to-face meetings in communities within 100 mile radius of the site, informative exhibits displayed at events (such as fairs, conventions, and meetings of safety and transportation interest groups) across the country, knowledgeable Speaker's Bureau services, guided tours through site facilities, aggressive outreach and interaction with the news media, broad educational outreach programs, and active participation in regulatory public hearings.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website www.wipp.carlsbad.nm.us

☒ Newspaper

☐ Open Houses

☒ Other

News releases to local/regional news

Internal WIPP Today and WIPP TRU-News

4 Are there any ongoing citizen suits against your facility?

☐ Yes

☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Carlsbad Department of Development	Tom Brown or Loraine Allen	505-887-6562
	Carlsbad Chamber of Commerce	Tracy Hill	505-887-6516
State/Local Regulator	New Mexico Environment Department	Steve Zappe	505-827-1557 ext 1013
Other community/local reference	City of Carlsbad Office of the Mayor	Gary Perkowski	505-887-3798

Section E

Application and Participation Statement

On behalf of WIPP
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the *Environmental Requirements Checklist*). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the *Achievement Track EMS requirements*, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Ines Friday / 9/28/00

Printed Name/Title Ines Friday, Manager CAO
Joe Epstein, General Manager

Facility Name WIPP

Facility Street Address 30 miles S.E. of Carlsbad on the Jal Highway
Carlsbad, NM 88220

Facility ID Numbers NM4890139088

Hazardous Waste Management Regulations

- | | | |
|----|---|-------------------------------------|
| 1. | Identification and Listing of Hazardous Waste (40 CFR 261) | <input checked="" type="checkbox"/> |
| | - Characteristic Waste | <input checked="" type="checkbox"/> |
| | - Listed Waste | <input checked="" type="checkbox"/> |
| 2. | Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | <input checked="" type="checkbox"/> |
| | - Manifesting | <input checked="" type="checkbox"/> |
| | - Pre-transport requirements | <input checked="" type="checkbox"/> |
| | - Record keeping/reporting | <input checked="" type="checkbox"/> |
| 3. | Standards Applicable to Transporters of Hazardous Waste (40 CFR 263) | <input type="checkbox"/> |
| | - Transfer facility requirements | <input type="checkbox"/> |
| | - Manifest system and record-keeping | <input type="checkbox"/> |
| | - Hazardous waste discharges | <input type="checkbox"/> |
| 4. | Standards for Owners and Operators of TSD Facilities (40 CFR 264) | <input checked="" type="checkbox"/> |
| | - General facility standards | <input checked="" type="checkbox"/> |
| | - Preparedness and prevention | <input checked="" type="checkbox"/> |
| | - Contingency plan and emergency procedures | <input checked="" type="checkbox"/> |
| | - Manifest system, Record keeping and reporting | <input checked="" type="checkbox"/> |
| | - Groundwater protection | <input checked="" type="checkbox"/> |
| | - Financial requirements | <input type="checkbox"/> |
| | - Use and management of containers | <input checked="" type="checkbox"/> |
| | - Tanks | <input type="checkbox"/> |
| | - Waste piles | <input type="checkbox"/> |
| | - Land treatment | <input type="checkbox"/> |
| | - Incinerators | <input type="checkbox"/> |
| 5. | Interim Status Standards for TSD Owners and Operators (40 CFR 265) | <input type="checkbox"/> |
| 6. | Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) | <input type="checkbox"/> |
| 7. | Administered Permit Program (Part B) (40 CFR 270) | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (*identify*)

- | | | |
|----|--|-------------------------------------|
| 8. | 20.4.1 NMAC Implementing those identified above | <input checked="" type="checkbox"/> |
| 9. | 40 CFR 191 Subpart A, Environmental Standards for Management and Storage | <input checked="" type="checkbox"/> |
| | 40 CFR 191 Subpart B, Environmental Standards for Disposal | |

Hazardous Materials Management

- | | | |
|----|---|-------------------------------------|
| 1. | Control of Pollution by Oil and Hazardous Substances (33 CFR 153) | <input type="checkbox"/> |
| 2. | Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) | <input checked="" type="checkbox"/> |
| 3. | Hazardous Materials Transportation Regulations (49 CFR 172-173) | <input checked="" type="checkbox"/> |
| 4. | Worker Right-to-Know Regulations (29 CFR 1910.1200) | <input checked="" type="checkbox"/> |
| 5. | Community Right-to-Know Regulations (40 CFR 350-372) | <input checked="" type="checkbox"/> |

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6. _____ ☐
7. _____ ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐
4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☒

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. NM Solid Waste Management Regulations; 20.9.1 NMAC Subpart VII Special Wastes ☒
7. Executive Order 13101, Greening the Government through Waste Prevention, Recycling, and Federal Acquisition ☒

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☐
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) Stormwater Only ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☒
14. Collection, Handling, Processing of Sewage Sludge ☒
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. _____ ☐
18. _____ ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☒
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☒
5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☒

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify)

7. _____ ☐
8. _____ ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. DOE is currently negotiating a Memorandum of Agreement with the EPA for the disposal of PCB-contaminated TRU waste. ☒
11. _____ ☐

Pesticide Regulations

- | | | |
|----|--|--------------------------|
| 1. | FIFRA Pesticide Use Classification (40 CFR 162) | <input type="checkbox"/> |
| 2. | Procedures for Disposal and Storage of Pesticides and Containers
(40 CFR 165) | <input type="checkbox"/> |
| 3. | Certification of Pesticide Applications (40 CFR 171) | <input type="checkbox"/> |
| 4. | Pesticide Licensing Requirements | <input type="checkbox"/> |
| 5. | Labeling of Pesticides | <input type="checkbox"/> |
| 6. | Pesticide Sales, Permits, Records, Application and Disposal Requirements | <input type="checkbox"/> |
| 7. | Disposal of Pesticide Containers | <input type="checkbox"/> |
| 8. | Restricted Use and Prohibited Pesticides | <input type="checkbox"/> |

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

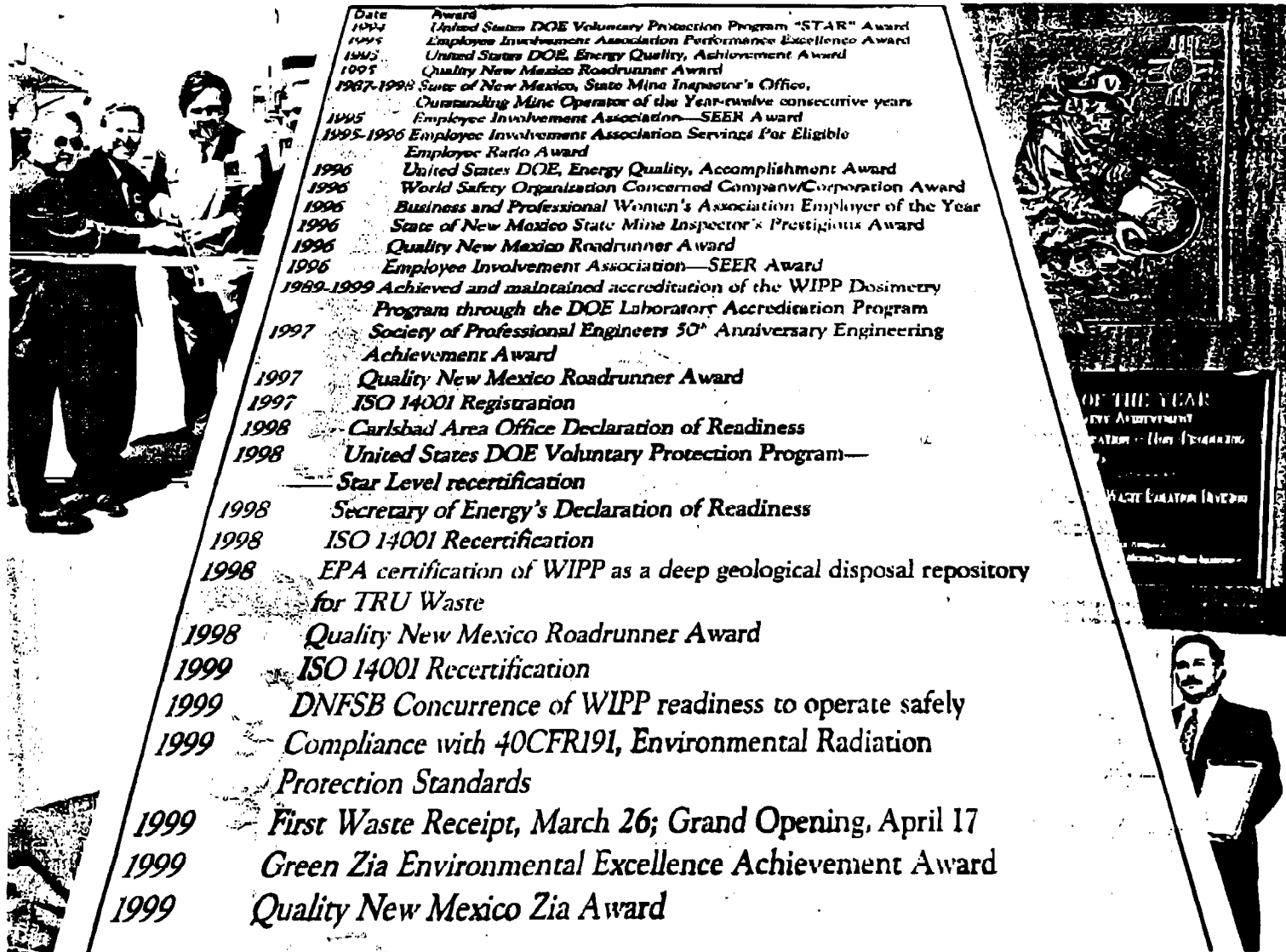
- | | | |
|-----|-------|--------------------------|
| 9. | _____ | <input type="checkbox"/> |
| 10. | _____ | <input type="checkbox"/> |

Environmental Clean-Up, Restoration, Corrective Action

- | | | |
|----|--|-------------------------------------|
| 1. | Comprehensive Environmental Response, Compensation and Liability
Act (Superfund) (identify) | |
| | _____ | <input type="checkbox"/> |
| | _____ | <input type="checkbox"/> |
| 2. | RCRA Corrective Action (identify) | |
| | WIPP Solid Waste Management Units and Areas of Concern | <input checked="" type="checkbox"/> |
| | _____ | <input type="checkbox"/> |

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective
Action Regulations Not Listed Above (identify)**

- | | | |
|----|-------|--------------------------|
| 3. | _____ | <input type="checkbox"/> |
| 4. | _____ | <input type="checkbox"/> |



Date	Award
1995	United States DOE Voluntary Protection Program "STAR" Award
1995	Employee Involvement Association Performance Excellence Award
1995	United States DOE, Energy Quality, Achievement Award
1995	Quality New Mexico Roadrunner Award
1987-1995	State of New Mexico, State Mine Inspector's Office, Outstanding Mine Operator of the Year-twelve consecutive years
1995	Employee Involvement Association—SEER Award
1995-1996	Employee Involvement Association Services For Eligible Employer Ratio Award
1996	United States DOE, Energy Quality, Accomplishment Award
1996	World Safety Organization Concerned Company/Corporation Award
1996	Business and Professional Women's Association Employer of the Year
1996	State of New Mexico State Mine Inspector's Prestigious Award
1996	Quality New Mexico Roadrunner Award
1996	Employee Involvement Association—SEER Award
1989-1999	Achieved and maintained accreditation of the WIPP Dosimetry Program through the DOE Laboratory Accreditation Program
1997	Society of Professional Engineers 50 th Anniversary Engineering Achievement Award
1997	Quality New Mexico Roadrunner Award
1997	ISO 14001 Registration
1998	Carlsbad Area Office Declaration of Readiness
1998	United States DOE Voluntary Protection Program—Star Level recertification
1998	Secretary of Energy's Declaration of Readiness
1998	ISO 14001 Recertification
1998	EPA certification of WIPP as a deep geological disposal repository for TRU Waste
1998	Quality New Mexico Roadrunner Award
1999	ISO 14001 Recertification
1999	DNFSB Concurrence of WIPP readiness to operate safely
1999	Compliance with 40CFR191, Environmental Radiation Protection Standards
1999	First Waste Receipt, March 26; Grand Opening, April 17
1999	Green Zia Environmental Excellence Achievement Award
1999	Quality New Mexico Zia Award

The opening of WIPP in 1999 was a landmark event for our company and for our nation's nuclear waste management commitment.